

**REMARKS/ARGUMENTS**

Reconsideration and allowance of this application are respectfully requested. Currently, claims 1-11 are pending in this application. Claims 3 and 9 have been allowed.

**Rejections Under 35 U.S.C. §103:**

Claims 1-2, 4-8 and 10-11 were rejected under 35 U.S.C. §103 as allegedly being unpatentable over Katseff et al (U.S. '796, hereinafter "Katseff") in view of Iyengar (U.S. '601). Applicant respectfully traverses this rejection.

In order to establish a prima facie case of obviousness, all of the claimed limitations must be taught or suggested by the prior art. Applicant respectfully submits that the combination of Katseff and Iyengar fails to teach or suggest all of the claimed limitations. For example, Applicant submits that the combination fails to teach or suggest a dynamic server computer running a proxylet for transforming data, the proxylet being referred to by an address within a data store connected to a computer network from where the proxylet is available for dynamic downloading by proxy server computers connected to the computer network.

Pages 2-3 of the Office Action admits the following:

"Katseff does not explicitly teach said dynamic proxy server computer being configured to run a program for transforming data, which program is referred to by an address within a data store connected to the computer network from where the computer program is available for downloading by server computers connected to the computer network, wherein the transforming performed by the dynamic proxy server computer is determined by the content of a protocol dynamically downloaded from a third server computer."

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In light of the above admission in the Office Action, Applicant respectfully submits that Katseff fails to teach or suggest a proxylet which is dynamically downloaded by proxy server computers connected to a network. Applicant submits that Iyengar fails to remedy this deficiency of Katseff. In particular, col. 16, lines 30-42 of Iyengar (specifically identified in the Office Action) merely discloses an applet being downloaded to and executed by a client terminal. For example, col. 16, lines 32-34 states “Here, clients would download all or part of the ‘converter’ logic 416 from the server 410’ to the client for execution.” Col. 16, lines 39-43 of Iyengar further states “In addition, the client will be able to continue conversations even if the server from which the client obtains the applet goes down or becomes unavailable due to network failure.”

It is thus clear that Iyengar discloses downloading and running an applet on a client terminal. Iyengar fails to disclose or even suggest dynamically downloading a proxylet to a proxy server computer, let alone running the proxylet on the proxy server computer to transform data from a first format to a second format without substantially changing the information content of the data. Accordingly, even if Katseff and Iyengar were combined as proposed by the Office Action, the combination would not have taught or suggested all of the claimed limitations.

Prior to the present invention, proxylets (small programs intended to run on proxy servers) were always expected to be resident on the proxy server in question. Neither Katseff nor Iyengar even provide any facilities whatsoever for permitting proxylets to be dynamically downloaded to a dynamic proxy server by reference to an

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address from some other point on the network. Accordingly, Applicant submits that one of ordinary skill in the art would not have been motivated at the time the invention was made to modify the teachings of Katseff/Iyengar to form the above claimed feature.

Accordingly, Applicant respectfully submits that claims 1-2, 4-8 and 10-11 are not "obvious" over Katseff and Iyengar and therefore respectfully requests that the rejection of these claims under 35 U.S.C. §103 be withdrawn.

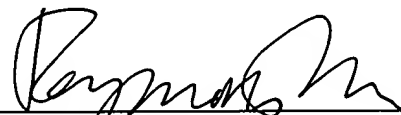
**Conclusion:**

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

**NIXON & VANDERHYE P.C.**

By: \_\_\_\_\_



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